

1 HANSON BRIDGETT LLP  
 KURT A. FRANKLIN, SBN 172715  
 2 kfranklin@hansonbridgett.com  
 LISA M. POOLEY, SBN 168737  
 3 lpooley@hansonbridgett.com  
 SAMANTHA WOLFF, SBN 240280  
 4 swolff@hansonbridgett.com  
 425 Market Street, 26th Floor  
 5 San Francisco, California 94105  
 Telephone: (415) 777-3200  
 6 Facsimile: (415) 541-9366

7 HANSON BRIDGETT LLP  
 TYSON M. SHOWER, SBN 190375  
 8 tshower@hansonbridgett.com  
 LANDON D. BAILEY, SBN 240236  
 9 lbailey@hansonbridgett.com  
 500 Capitol Mall, Suite 1500  
 10 Sacramento, California 95814  
 Telephone: (916) 442-3333  
 11 Facsimile: (916) 442-2348

12 OTTEN LAW, PC  
 VICTOR OTTEN, SBN 165800  
 13 vic@ottenlawpc.com  
 KAVITA TEKCHANDANI, SBN 234873  
 14 kavita@ottenlawpc.com  
 3620 Pacific Coast Highway, #100  
 15 Torrance, California 90505  
 Telephone: (310) 378-8533  
 16 Facsimile: (310) 347-4225

17 Attorneys for Plaintiffs  
 CORY SPENCER, DIANA MILENA  
 18 REED, and COASTAL PROTECTION  
 RANGERS, INC.  
 19

20 **UNITED STATES DISTRICT COURT**  
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
 22

23 CORY SPENCER, an individual;  
 24 DIANA MILENA REED, an  
 individual; and COASTAL  
 25 PROTECTION RANGERS, INC., a  
 26 California non-profit public benefit  
 corporation,  
 27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' APPLICATION FOR  
 LEAVE TO FILE DOCUMENTS  
 UNDER SEAL**

Filed Concurrently with Declaration of  
 Samantha Wolff; Redacted Versions of  
 Documents Proposed to be Filed Under  
 Seal; Unredacted Versions of Documents  
 Proposed to be Filed Under Seal: and

[Proposed] Order

v.

Complaint Filed: March 29, 2016  
 Trial Date: November 7, 2017

LUNADA BAY BOYS; THE  
 INDIVIDUAL MEMBERS OF THE  
 LUNADA BAY BOYS, including but  
 not limited to SANG LEE, BRANT  
 BLAKEMAN, ALAN JOHNSTON  
 AKA JALIAN JOHNSTON,  
 MICHAEL RAE PAPAYANS,  
 ANGELO FERRARA, FRANK  
 FERRARA, CHARLIE FERRARA,  
 and N. F.; CITY OF PALOS VERDES  
 ESTATES; CHIEF OF POLICE JEFF  
 KEPLEY, in his representative  
 capacity; and DOES 1-10,

Defendants.

Pursuant to Local Rule 79-5, Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. ("Plaintiffs") hereby apply for leave of Court to file **Exhibits 39, 40, 41, and 42** to the Declaration of Samantha Wolff In Support of Plaintiffs' Opposition to the Individual Defendants' Motions for Summary Judgment Or, In the Alternative, Summary Adjudication ("Wolff Declaration") and portions of **Exhibit 8** to the Wolff Declaration, under seal. Exhibits 39 and 40 consist of Defendant Sang Lee's cell phone records, as produced by his cell phone carrier. Exhibit 41 consists of text messages sent and received by Defendant Alan Johnston. Portions of Exhibit 8 consist of a number of emails sent and received by Defendant Sang Lee. These documents were produced in discovery by Defendants and contain information protected from disclosure pursuant to the parties' stipulated protective order, including Defendants' full cell phone numbers and the cell phone numbers of third parties, as well as Defendants' and third parties' email addresses.

1 Counsel for the Individual Defendants were informed of Plaintiffs' intent to  
2 seek leave to file these exhibits under seal. *See* Declaration of Samantha Wolff In  
3 Support of Application for Leave to File Under Seal.

4 DATED: August 8, 2017

HANSON BRIDGETT LLP

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6  
7 By: /s/ Samantha D. Wolff

KURT A. FRANKLIN

LISA M. POOLEY

SAMANTHA D. WOLFF

TYSON M. SHOWER

LANDON D. BAILEY

Attorneys for Plaintiffs

CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.